

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION**

In re:Edgar Contreras and Delia B Ciruelas ) Judge Jack B Schmetterer  
Debtor(s) )  
 ) Case No. 19-25114  
 )  
 ) Chapter 13

**NOTICE OF MOTION**

To the following named persons or entities: (Separate Service List may be attached)

Edgar Contreras and Delia B Ciruelas  
4442 W. Gunnison  
Unit #1

Tom Vaughn  
(Served by ECF: ecf@tvch13.net

**CERTIFICATE OF SERVICE\***

I, Robert J. Adams, an attorney, certify that a copy of this Notice and attached documents were served upon the above-entitled parties by depositing same in the United States mail\* at 540 W. 35th St. Chicago, IL 60616, with sufficient postage prepaid by Robert J. Adams & Associates.

Date of Service: 09/19/2019

Signature: /s/ Robert J. Adams  
Robert J. Adams

Please take notice that on **October 2, 2019 at 10:00 AM** I shall appear before the Honorable Judge Jack B Schmetterer in Court Room 682 at the U.S. Bankruptcy Court located at 219 S. Dearborn, Chicago, Illinois 60604 and present the attached motion.

\*Where indicated, some parties have been served electronically instead of by mail

**United States Bankruptcy Court  
Northern District of Illinois**

In re Edgar F Contreras and Delia B. Ciruelas  
Debtor(s)

Case No. 19-25114  
Chapter. 13

**CERTIFICATE OF MAILING**

The undersigned hereby certifies that a true copy of the following document(s):

*Motion to Extend Stay*

was(were) mailed to all persons in interest at the addresses set forth in the exhibit which is attached hereto, electronically or by first class mail, postage prepaid, on .

9/19/2019

/s/ Robert J Adams

Robert J Adams  
Bar Number: 0013056  
540 W 35th St  
Chicago, IL 60616-3532  
Phone: (312) 346-0100  
Email: staff.rja@gmail.com

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Carol Stream, IL 60197

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Chicago, IL 60630

**Gunnison Condominium  
Association**  
4442 W. Gunnison  
Chicago, IL 60630

**Jefferson Capital Systems**  
PO Box 772813  
Chicago, IL 60677

**Monroe & Main**  
1112 7th Ave  
Monroe, WI 53566

**Ocwen**  
PO Box 6440  
Carol Stream, IL 60197

**Opturn**  
PO Box 4085  
Atherton, CA 94027

**Premier Bankcard, Llc**  
Po Box 7999  
Saint Cloud, MN 56302-7999

**Robert J. Adams & Associates**  
540 E. 35th Street  
Chicago, IL 60616

**Suncash**  
5800 W. North Ave.  
Chicago, IL 60639

**The Girard Law Group, P.C.**  
Mary A. Johnston  
4311 N. Ravenswood 202  
Chicago, IL 60613

**Unifund CCR Partners**  
C/O Blitt and Gaines, P.C.  
661 Glenn Avenue  
Wheeling, IL 60090

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Certificate of Notice Page 2 of 3  
United States Bankruptcy Court  
Northern District of Illinois

In re:  
Edgar F. Contreras  
Delia B. Ciruelas  
Debtors

Case No. 17-02507-JBS  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0752-1

User: pseamann  
Form ID: ntcdsdm

Page 1 of 2  
Total Noticed: 23

Date Rcvd: Jun 20, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 22, 2019.

db/jdb +Edgar F. Contreras, Delia B. Ciruelas, 4442 W. Gunnison St., Unit 1,  
Chicago, IL 60630-4802  
25322477 Check 'n Go, C/O Real Time Resolutions, Inc., PO Box 566027, Dallas, TX 75356-6027  
25290315 First Premier Bank, 601 S Minneapolis Ave, Dious FDalls, SD 57104  
25290319 +Med Business Bureau, 1460 Renaissance Dr #400, Park Ridge, IL 60068-1349  
27048994 +U.S. Bank National Association, Ocwen Loan Servicing, LLC, c/o Codilis & Associates, P.C.,  
15W030 N. Frontage Road, Suite 100, Burr Ridge, IL 60527-6921  
25727772 +US Bank National Association, Ocwen Loan Servicing, LLC, Attn: Bankruptcy Department,  
P.O. Box 24605, West Palm Beach, FL 33416-4605  
25290322 +Westward Management, Inc., 4311 N. Ravenswood Ave., Suite 201, Chicago, IL 60613-1192

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
tr +E-mail/Text: bncnotice@tomvaughntrustee.com Jun 21 2019 01:18:21 Tom Vaughn,

55 E. Monroe Street, Suite 3850, Chicago, IL 60603-5764  
25685796 +EDI: ATTWIREBK.COM Jun 21 2019 04:58:00 AT&T CORP, % AT&T Services, Inc.,  
Karen Cavagnaro, Lead Paralegal, One AT&T Way, Room 3A104, Bedminster, NJ 07921-2693  
25701506 +EDI: CINGMIDLAND.COM Jun 21 2019 04:58:00 AT&T Mobility II LLC, %AT&T SERVICES INC.,  
KAREN A. CAVAGNARO LEAD PARALEGAL, ONE AT&T WAY, SUITE 3A104, BEDMINSTER, NJ. 07921-2693  
25612177 +E-mail/Text: bankruptcy@cavps.com Jun 21 2019 01:18:03 Cavalry SPV I, LLC,  
500 Summit Lake Drive, Ste 400, Valhalla, NY 10595-2321  
26092053 +E-mail/Text: bncmail@w-legal.com Jun 21 2019 01:17:55 Cerastes, LLC,  
C/O Weinstein & Riley, P.S., 2001 Western Ave., Ste. 400, Seattle, WA 98121-3132  
25290312 +EDI: CONVERGENT.COM Jun 21 2019 04:58:00 Convergent Outsourcing, Inc, Po Box 9004,  
Renton, WA 98057-9004  
25290313 +EDI: CMIGROUP.COM Jun 21 2019 04:58:00 Credit Management, LP,  
The Offices of Credit Management, LP, Po Box 118288, Carrollton, TX 75011-8288  
25290314 +E-mail/Text: bknotice@ercbpo.com Jun 21 2019 01:17:50 ERC/Enhanced Recovery Corp,  
8014 Bayberry Rd, Jacksonville, FL 32256-7412  
25290316 +E-mail/Text: agirard@girardlawgroup.com Jun 21 2019 01:18:09 Girard Law Group,  
4311 N. Ravenwood, #202, Chicago, IL 60613-1192  
25290317 +EDI: IIC9.COM Jun 21 2019 04:58:00 IC Systems, Inc, 444 Highway 96 East,  
St Paul, MN 55127-2557  
25669783 EDI: JEFFERSONCAP.COM Jun 21 2019 04:58:00 Jefferson Capital Systems LLC, PO Box 7999,  
Saint Cloud MN 56302-9617  
25290318 EDI: JEFFERSONCAP.COM Jun 21 2019 04:58:00 Jefferson Capital Systems, LLC, 16 Mcleland Rd,  
Saint Cloud, MN 56303  
25290320 +Fax: 407-737-5634 Jun 21 2019 01:38:20 Ocwen Loan Servicing Llc, Attn: Research Dept,  
1661 Worthintong Rd Ste 100, West Palm Beach, FL 33409-6493  
25667667 +EDI: JEFFERSONCAP.COM Jun 21 2019 04:58:00 Premier Bankcard, LLC,  
c o Jefferson Capital Systems LLC, PO BOX 7999, SAINT CLOUD MN 56302-7999  
25290321 +EDI: SWCR.COM Jun 21 2019 04:58:00 Southwest Credit Systems,  
4120 International Parkway Ste 1100, Carrollton, TX 75007-1958  
25457570 +E-mail/Text: bk@blittandgaines.com Jun 21 2019 01:17:07 Unifund CCR Partners,  
C/O Blitt and Gaines, P.C., 661 Glenn Avenue, Wheeling, IL 60090-6017

TOTAL: 16

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jun 22, 2019

Signature: /s/Joseph Speetjens

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION**

In re:Edgar Contreras and Delia B Ciruelas ) Judge Jack B Schmetterer  
Debtor(s) )  
 ) Case No. 19-25114  
 )  
 ) Chapter 13

**DEBTOR'S MOTION TO EXTEND THE AUTOMATIC STAY**

NOW COMES Edgar Contreras and Delia B Ciruelas, hereinafter referred to as "Debtor(s)", by and through the Law Offices of Robert J. Adams & Associates, and states as follows:

1. On September 5, 2019, Debtor(s) filed a voluntary petition for relief under Title 11 U.S.C. Chapter 13. This Honorable Court has jurisdiction over this proceeding under the provisions of Title 11 U.S.C. § 105 and Title 28 U.S.C. § 157.
2. The debtor(s) had a prior bankruptcy case dismissed within the preceding year: Case Number 17-02507, dismissed on June 19, 2019. In the prior case the Debtor's fell behind on the Chapter 13 payments because they were sending money to the Philippines to because two of their family members were very ill with and did not have the resources to pay for their own medical care. Now of the two that were sick one has passed away, and the other is in remission and does not require any additional financial help. Further, it has been agreed that the Debtor's will be on payroll control to insure that the payments are received.
3. The debtor(s) had a substantial change in their financial and/or personal affairs since the previous case that will effectively rebut the presumption of this case not being filed in good faith pursuant to 11 U.S.C. § 362(c)(3)(C) by clear and convincing evidence. See attached affidavit of debtor(s).

WHEREFORE Edgar Contreras and Delia B Ciruelas, the Debtor(s) herein, pray(s) that this Honorable Court enter an Order extending the Automatic Stay against all creditors for the duration of this Chapter 13 bankruptcy (unless the Automatic Stay is modified properly upon the motion of any creditor) and grant the debtor such other relief as just and proper.  
Robert J. Adams & Associates - 540 W. 35th St. Chicago, IL 60616 Phone: 312.346.0100

Respectfully submitted,

/s/ Robert J. Adams

Attorney for Edgar Contreras and Delia B  
Ciruelas  
Robert J. Adams & Associates